

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

TERA A. McMILLIAN)	
Plaintiff)	
)	
v.)	Civil Action No: 2:07-cv-0001-WKW
)	
ALABAMA DEPARTMENT OF YOUTH SERVICES, et al.,)	(JURY DEMAND)
Defendants)	

Plaintiff's List of Proposed Trial Exhibits

Comes now the Plaintiff, by and through undersigned counsel, and submits this list of proposed exhibits in this matter in accord with the Court's Order dated February 14, 2008.

Exhibit

- 1 McMillian appointment letter dated October 22, 2002
- 2 Notes of Investigative Findings by Debra Spann dated June 14, 2005
- 3 Spann Meeting Notes
- 4 EEOC Charge of Discrimination, 7/12/05
- 5 Memo from Debra Spann, DYS Personnel Manager, to J. Walter Wood Jr., dated July 19, 2005
- 6 Memo from Joe Pinkard to Phyllis Rankins, dated September 26, 2005
- 7 Memo from Tim Davis, Deputy Director to J. Walter Wood, November 3, 2005.
- 8 Letter from J. Walter Wood to Michael Hardy, November 4, 2005
- 9 November 15, 2005 Termination Hearing Transcript
- 10 Marcia Calendar Memo to J. Walter Wood, 12/8/05
- 11 Letter from J. Walter Wood Jr. to Michael Hardy, January 6, 2006.

12 Statement of Facts for State Personnel Hearing
13 Administrative Law Judge Recommended Order dated August 1, 2007.
14 Hardy Retaliation Documents. 6/21/05; 7/14/05
15 EEOC Charge of Discrimination, 12/11/05
16 EEOC Dismissal and Notice of Rights
17 Staton Interview of McMillian, Feb 16, 2006
18 Staton Interview of Harris, March 8, 2006
19 Staton Interview of Lee, March 9, 2006
20 Staton Interview of Rankins, March 10, 2006
21 Staton Report re: EEOC Charge, 3/31/06
22 Staton Interview of McMillian, December 1, 2006
23 Staton Investigative Summary, 02/27/2007
24 Rosters of employees attending training 2005-2007
25 Internal Memos/Reports at ITU re: McMillian
26 Transcription of Sylvesta Lee's tape recordings
27 Table of ITU Employee Sign In/Out Times, March-April 2006 with
supporting Time & Attendance Reports
28 I.T.U. Meeting Notices
29 Security Gate Log of employees entering and leaving
30 Daily Time & Attendance Reports: 06/11/05-06/19/05
31 McMillian Performance Evaluations, 2002-2007
32 Lee's Letter to McMillian, December 6, 2005
33 Lee's Contact with Staff memo Jan 20, 2006 re: Insubordination
34 Lee's Memo re: Mandatory A Training 2006
35 Hardy Memo re: Sex Discrimination, 1/18/00
36 Defendant's Response to Requests for Admissions
37 DYS Discrimination Complaints: 2004 - 2007

Additionally, the plaintiff may utilize and offer into evidence any materials necessary for evidentiary foundation or rebuttal purposes and/or any materials designated by the defendant as potential exhibits in the trial of this matter.

Respectfully submitted this 19th day of June 2008.

/S/ JIMMY JACOBS

JIMMY JACOBS (JAC051)

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using CM/ECF system and service will be perfected upon counsel of record following this the 19th of June 2008.

/s/Jimmy Jacobs

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